

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	
V.)	CRIMINAL CASE NO. 12-CR-61-PB
)	
TOSATTI PADMORE,)	
)	
Defendant)	

ASSENTED TO MOTION TO CONTINUE

NOW COMES the defendant, TOSATTI PADMORE, by and through counsel, and hereby moves this Court to continue his May 21, 2013 Sentencing Hearing for two weeks.

In support of this Motion, the defendant states as follows:

1. The defendant is scheduled to appear in this Court on May 21, 2013, at 2:30 p.m. for his Sentencing Hearing;
2. The Plea Agreement in this case contains a stipulated sentencing range with respect to the drug conviction. That stipulation was based on both parties understanding as to what the drug quantity calculation attributable to the defendant would be. The Presentence Report, however, attributes to the defendant quantities that neither party believes are attributable to the defendant. Both parties are of the belief that the drug quantity issue can be resolved by way of agreement with probation but believe that a two week continuance would facilitate the anticipated agreement.
3. That the defendant is aware of this motion;
6. That Attorney William Morse, Assistant U.S. Attorney, has no objection to this motion.

WHEREFORE, the defendant respectfully requests that this Court grant the within Assented to Motion to Continue Trial for two weeks.

Respectfully submitted
Tosatti Padmore,
By his Attorney,

Date: May 17, 2013

/S/Paul J. Garrity
Paul J. Garrity
Bar No. 905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 17th day of May, 2013, a copy of the within was e filed to the United States Attorney's Office, parties of record and mailed, postage prepaid, to Tosatti Padmore.

/S/Paul J. Garrity
Paul J. Garrity